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16 November 1998

Mr. Bruce Halstead
U.S. Fish and Wildlife Service
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Post-It Fax Note

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Date	11/16/98	# of Pages	2
To	Jim Halstead		
From	SEAN M. MURPHY		
Co./Dept	Co.		
Phone #	Phone #		
Fax #	916-653-8102		

Dear Mr. Halstead:

Thank you for the opportunity to comment on the Pacific Lumber Company Habitat Conservation Plan and the attendant Environmental Impact Statement. I write this brief letter as a scientist with nearly twenty years of experience with Habitat Conservation Planning under Section 10(a) of the Endangered Species Act, starting with the first plan on San Bruno Mountain. During this period I also have served on the Interagency Spotted Owl Scientific Committee, chaired the Scientific Review Panel to the nation's first Natural Communities Conservation Plan in southern California, was a member of the National Academy of Science's Committee on Science and the Endangered Species Act, and currently lead the Lake Tahoe Watershed Assessment. Importantly for context here, I was intimately involved with the Pacific Lumber HCP in the summer and autumn of 1997, proposing a reserve design strategy (which at that time reactivated then broken-down discussions) and outlining an analytical pathway to assess available scientific information. Since the beginning of this year my involvement with this HCP has been less; however, in March 1998 I contributed to the GIS-based, spatially-resolved analysis of old-growth and late seral forest elements which has provided the foundation for the draft HCP.

Other comment letters will undoubtedly muster arguments over the adequacy of the HCP in providing habitat to sustain species of concern on the Pacific Lumber holding. Special attention will certainly be paid to the plight of the threatened marbled murrelet, since this HCP plans for the last remaining, unplanned-for occupied habitat on private lands in California (the vast majority of habitat for this species is on public lands). A number of demographic models and viability analyses will likely be offered in attempts to set the plan in spatial and temporal context; some may suggest that uncertainty about the status of the species compromises current planning and puts the species at unacceptable risk.

I take issue with such a position and make the following observations. First, although much is yet to be learned about the reproduction, dispersal, and other salient aspects of murrelet biology, current information on the species has been appropriately applied in critical analyses of proposed take of the species and in assessing the likely outcome of future timber harvest activities on the property. Second, the plan appropriately uses current theory and tools in the development of the plan, and to draw its conclusions about the level of and likely effect of take on the persistence of marbled murrelets. Third, and most important, while some uncertainties surrounding murrelets and their habitats remain, the current HCP is extremely conservative in its short-term impacts. It

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recognizes the environmental correlates of habitat suitability for the species, by retaining nearly all existing redwood forest groves it reduces immediate losses and long-term impacts, and by prescribing forest grove buffers it increases high-quality habitat availability through time. In sum, because of the conservative nature of this HCP, with its substantive set-asides of the very best habitat on site, the need for technical (scientific) information has been dramatically reduced and uncertainties rendered less important than in most similar planning efforts.

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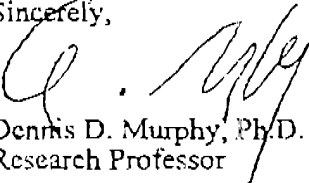
Despite ongoing controversy over the long-term fate of Pacific Lumber's lands, what has emerged is a laudable plan that rigorously and responsibly addresses critical concerns about the fate of the marbled murrelet. Few HCPs enjoy a land acquisition program fueled by nearly half a billion dollars of public funds. But that critical element, combined with a well-reasoned and defensible reserve design and management strategy, makes this HCP one of the potentially most effective plans this conservation biologist has reviewed. I strongly support the draft HCP for Pacific Lumber's lands in Humboldt County.

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If I can provide any further information or detail, I can be reached at (702) 784-1303.

Sincerely,



Dennis D. Murphy, Ph.D.
Research Professor

cc: Mr. Jim Gaither, California Resources Agency and California Department of Forestry and Fire Protection